

REDACTED

EXHIBIT A

REDACTED

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS	:	Master File No. 12-md-02311
ANTITRUST LITIGATION	:	Honorable Marianne O. Battani
	:	
In Re: Wire Harness Cases	:	
	:	
THIS DOCUMENT RELATES TO:	:	
All Auto Dealer Actions	:	2:12-cv-00102-MOB-MKM
	:	

**[PROPOSED]
ORDER RESOLVING DEFENDANTS’ MOTION TO COMPEL DOWNSTREAM
DISCOVERY AND DEFENDANTS’ OUTSTANDING DISCOVERY REQUESTS**

IT IS ORDERED that:

1. The parties will meet and confer as to any disputes regarding the attached fields within fourteen days of the entry of this stipulation and Dealership Plaintiffs will advise Defendants of any objections Dealership Plaintiffs have to the attached fields. Defendants will submit any disputes to the Master within ten days of the parties’ meet and confer and Dealership Plaintiffs will respond ten days later.
2. Dealership Plaintiffs will produce from their Dealer Management Systems (“DMSes”) all existing reasonably accessible data set forth in the attached fields provided said fields are not subject to objections that have been either upheld by

REDACTED

the Court or Master or agreed upon by Defendants. The temporal scope for this production is January 1998-December 2013.

3. Data for 10 Dealership Plaintiffs will be produced within 60 days of the entry of this order, save for any fields subject to objections. Dealership Plaintiffs will make best efforts to advise Defendants of the identities of said Dealers within 45 days of the entry of this Order.
4. Data for 30 Dealership Plaintiffs will be produced within 90 days of the entry of this order, save for any fields subject to objections. Dealership Plaintiffs will make best efforts to advise Defendants of the identities of said Dealers within 65 days of the entry of this Order.
5. Data for the remaining Dealership Plaintiffs for whom data exists, will be produced within 120 days of the entry of this order save for any fields subject to objections.
6. Defendants may not file any motions to compel against Dealership Plaintiffs until after they have finished reviewing all of the productions and have met and conferred with Dealership Plaintiffs pursuant to paragraph 7.
7. Once Dealership Plaintiffs' production is completed and Defendants have reviewed Dealership Plaintiffs' production, Defendants will meet and confer with Plaintiffs as to any temporal gaps in Dealership Plaintiffs' production or any missing information regarding particular vehicle purchases and sales. The parties will work to ascertain whether Dealership Plaintiffs can reasonably obtain and produce reasonably accessible data or documents to fill said temporal gaps or

REDACTED

provide said missing information. If the parties do not resolve the above-described issues, regarding missing information or temporal gaps within the production, Defendants may file one motion to compel with regard to them, after the parties have finished their negotiations.

8. Dealership Plaintiffs will not have further obligations to respond to a specific discovery request in response to which Dealership Plaintiffs have already agreed to provide documents to the extent that the data produced pursuant to this stipulation is sufficient to show the information sought by that specific discovery request, absent good cause shown.
9. Defendants will not seek Dealership Plaintiffs' data from any person or entity other than Dealership Plaintiffs.
10. Requests for extensions of seven days will be granted by either of the parties as a matter of course. If either party requires an extension longer than seven days, the parties will meet and confer to discuss said request.
11. This Order Resolves Certain Defendants' Motion to Compel Downstream Discovery (2:12-cv-00102, ECF No. 186) and any other Requests as to which Defendants were required to move to compel production by July 14, 2014, under the Stipulated Order Regarding Discovery Plan, 2:12-cv-00100-MOB-MKM (Doc # 232), Filed 07/01/14, and further motions to compel regarding responses to these requests or duplicative requests will not be filed, except as set forth above in paragraph 7. This stipulation also modifies the Stipulation and Order on Certain

REDACTED

Defendants' Motion to Compel "Downstream" Discovery from Auto Dealer
Plaintiffs 2:12-cv-00102-MOB-MKM Doc # 251.

12. The parties reserve their rights as to relevance arguments.

IT IS SO ORDERED.

Dated: _____, 2015 _____

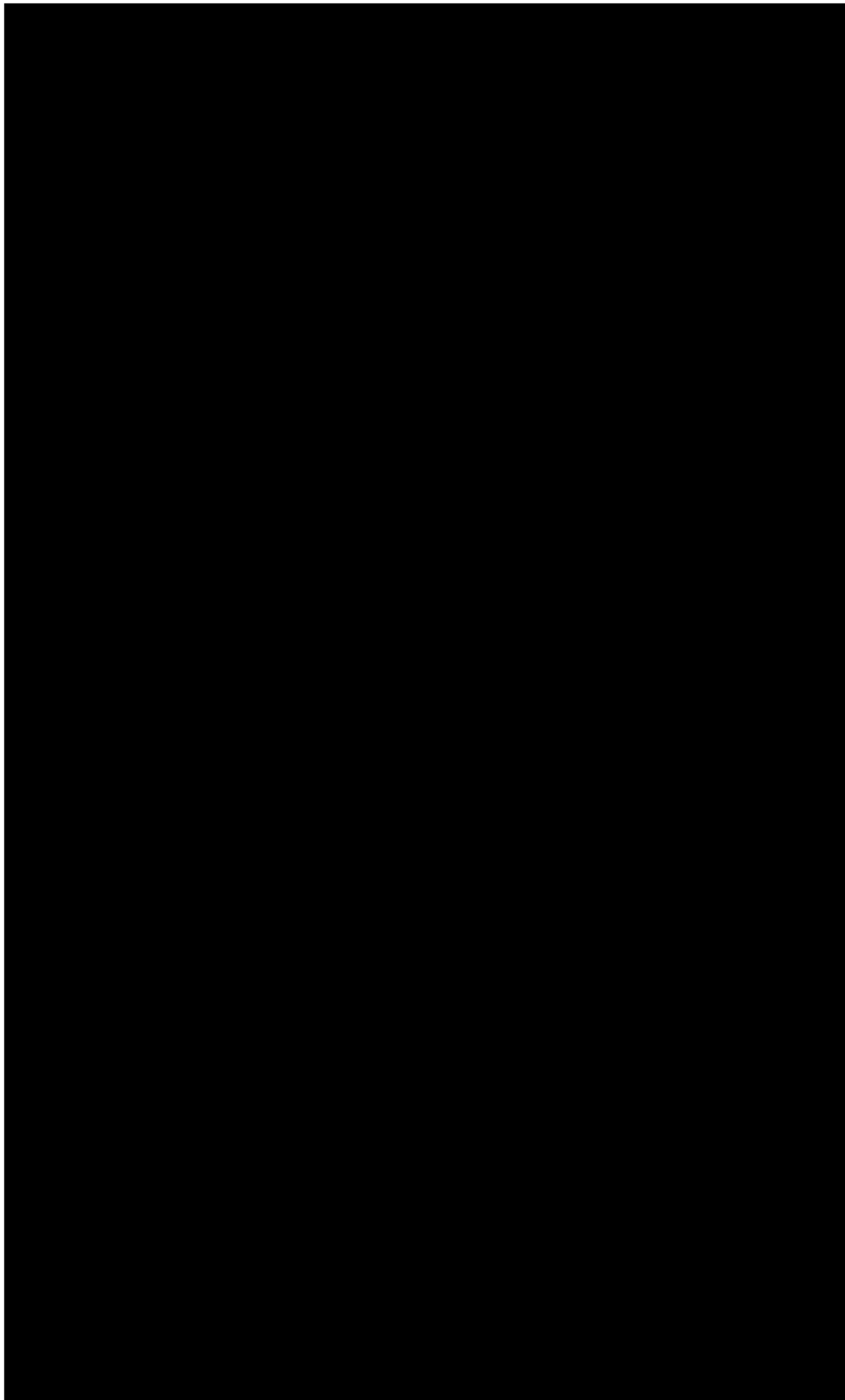
Special Master Gene J. Esshaki

REDACTED

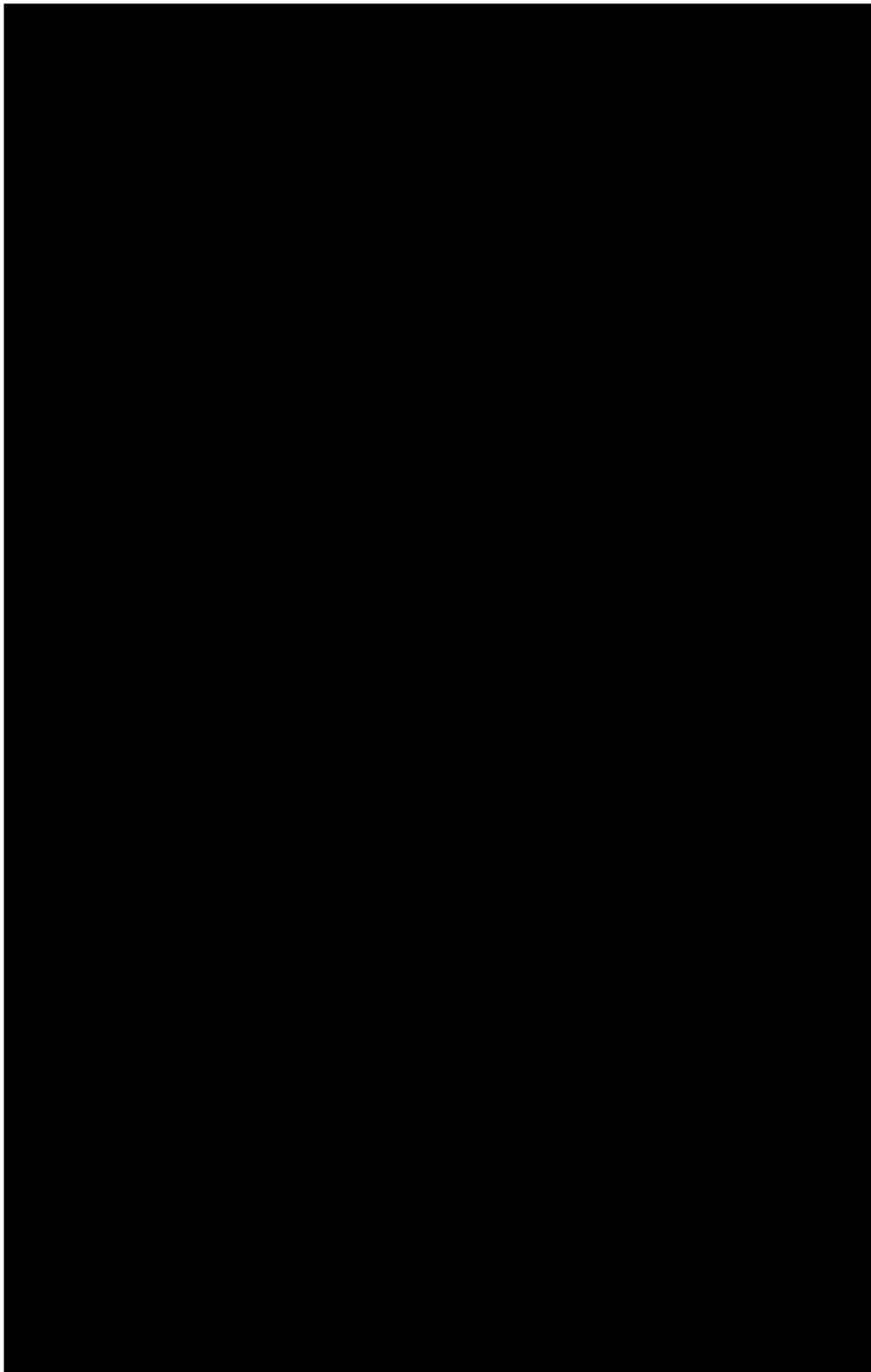
ATTACHEMENT A-DEALERSHIP FIELDS-HIGHLY CONFIDENTIAL –OUTSIDE



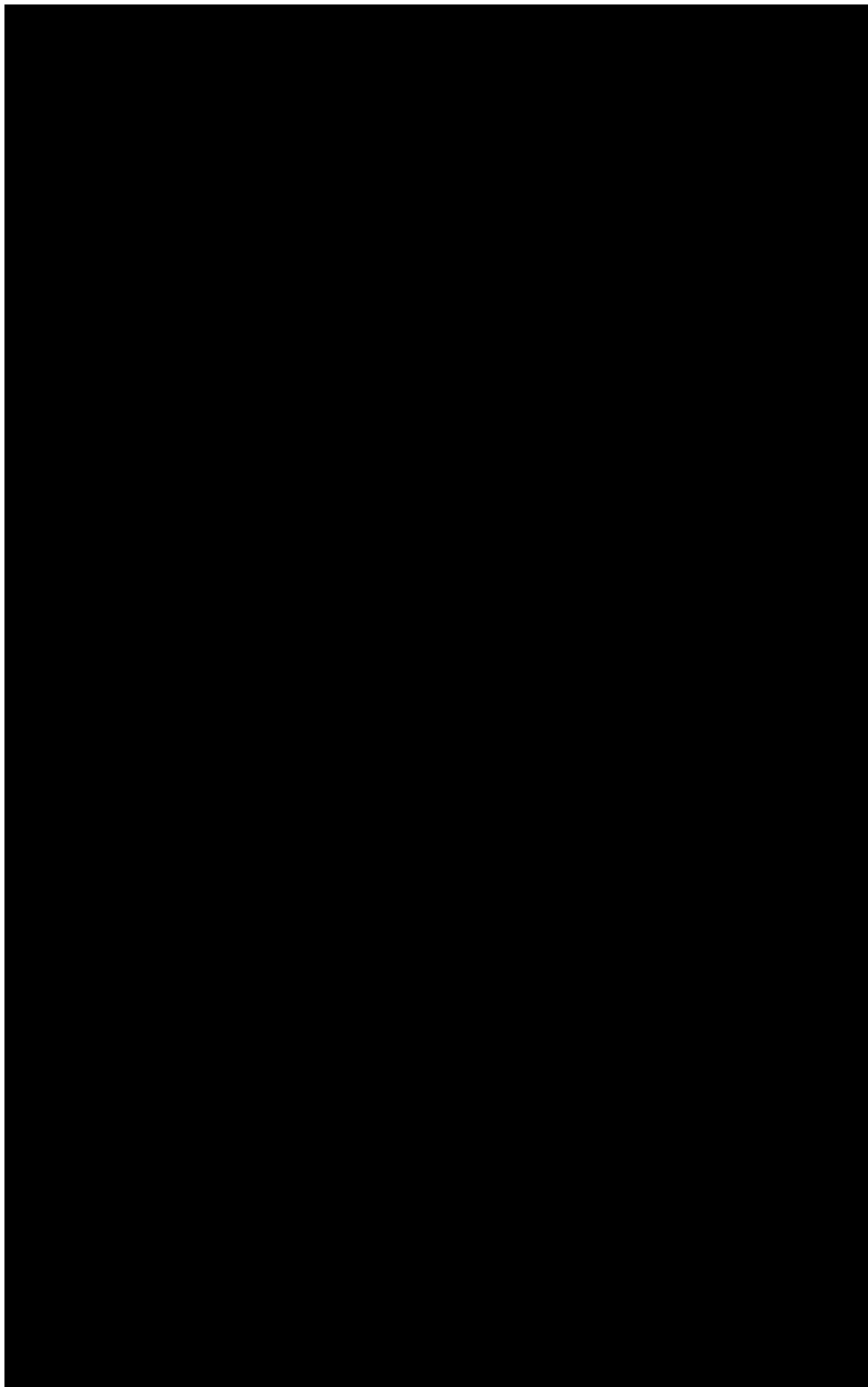
REDACTED



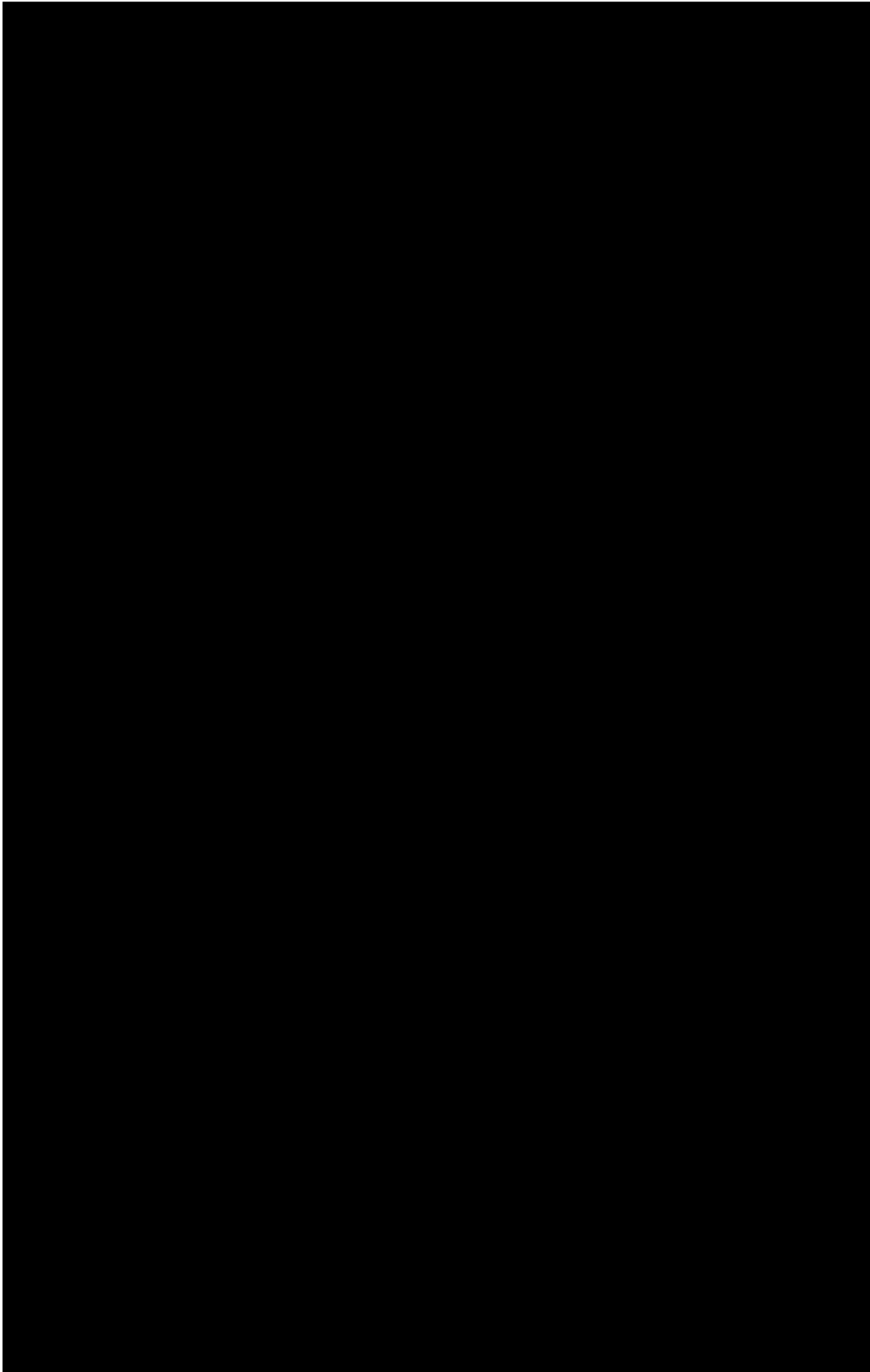
REDACTED



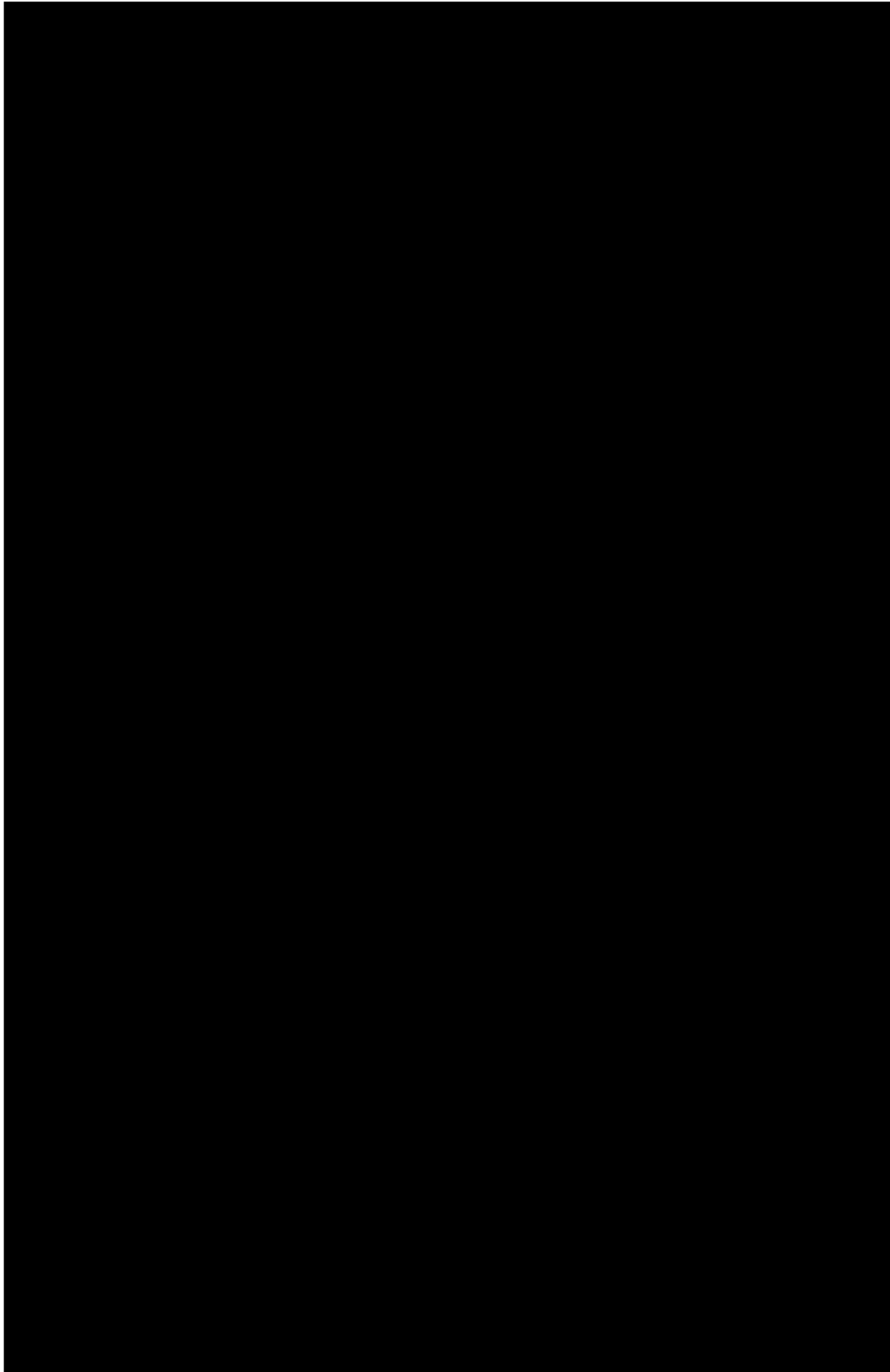
REDACTED



REDACTED



REDACTED



REDACTED

